

EXHIBIT A

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

THEFBAMACHINE INC. *et al.*,

Defendants.

Civil Action No.: 24-6635

**AFFIDAVIT OF AMANDA
ROZENFELD IN SUPPORT OF
OPPOSITION TO PLAINTIFF'S
APPLICATION FOR A
PRELIMINARY INJUNCTION**

STATE OF NEW JERSEY)
)
COUNTY OF _____) ss:

AMANDA ROZENFELD, of full age and sound mind, does hereby swear
as follows:

1. I am a named defendant in the above-captioned matter. I make this affidavit based upon my personal knowledge, and in opposition to Plaintiff, the

Federal Trade Commission's ("FTC"), application for a preliminary injunction. (ECF No. 34).

2. It is my understanding that FTC has alleged that I am involved in the management and/or operations of FBA Machine Inc, FBA.Support LLC, Daily Distro LLC, Passive Scaling Inc., Sales.Support New Jersey Inc., 3PL Logistic Automation, Inc., 1HR Deliveries Inc., and Hourly Relief Inc.

3. In short, I am not, nor have I ever been, involved with the management or operation of these companies.

4. The first time I learned any information about how these companies operate, or even what industry they are in, was when I read the allegations made by the FTC in its amended complaint. (ECF No. 27).

5. Specifically, FTC claims that I was a representative for a company named FBA.Support LLC. Until the FTC named me as a party to this action, however, I did not know that I am listed as a corporate representative for FBA.Support LLC. At no time have I ever represented myself to anyone as a representative of that company, nor did I ever consent to the use of my name for that purpose.

6. FTC also alleges that I acted as a contact person and a representative for FBA.Support LLC and Daily Distro LLC for their respective interactions with a payment processor called "Stripe." I have never communicated with anyone from

Stripe, and had no knowledge that I was listed as a contact person for anything related to operating a “Stripe” “account.” Nor have I ever consented to the use of my name for that purpose.

7. Despite the claims of FTC, I have never served as the Operations Manager for Passive Scaling Inc. I have no knowledge of what that company does, or what its “operations” entail. I certainly never had control over Passive Scaling, Inc., or any other company identified in the Amended Complaint, including, for example, Daily Distro LLC.

8. I do not have access to, and have never used nor accessed, the following email addresses: amanda@passivescaling.com and sales@passivescaling.com.

9. FTC also alleges that I personally signed contracts on behalf Passive Scaling, Inc. Though my name may have been affixed to some of those documents, I have never signed anything on behalf of Passive Scaling, Inc. Nor have I consented to the use of my name or signature for purposes of signing documents on behalf of Passive Scaling, Inc.

10. FTC also alleges that I was “employed” by Daily Distro LLC. I did receive annual compensation valued at \$50,000.00 from that company. I received this compensation paid over the course of the year from Daily Distro LLC.

11. However, I have never performed any services in connection with that compensation. . Instead, payments were presented to me as proceeds from my

husband's company to use as spending money for me and my family. I have never worked for Daily Distro LLC.

12. I never took any steps to disguise ownership of web domains. I was unaware of my purported ownership of those web domains, and in many cases, unaware that those web domains existed at all.

13. I never knew that there were customer complaints and "chargeback" issues with Stripe, and I did not engage in communications regarding these topics. This is because, as mentioned, I did not have any involvement with any of the aforementioned companies.

14. For these reasons, I respectfully request that the Court deny the request for an injunction against me because I was not involved in any improper conduct as alleged in the Amended Complaint.

I swear under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge, information and belief.

Sworn to and subscribed
before me this 8 day
of August, 2024.

K.Y.

Notary Public
My Commission Expires: Feb 11, 2025

